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KENTON J. GILBERT  
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WESTERN DISTRICT OF OHIO  
CINCINNATI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

Vs.

TYREESE DORRAN PUGH,

Defendant

CASE NO. CR-1-02-054

(Judge Weber)

**Demand for Discovery and  
Bill of Particulars**

A. DEMAND FOR DISCOVERY

Defendant requests disclosure forthwith by the Prosecutor of the information, inspection and copying to which the Defendant is entitled, including:

1. Statements of the Defendant or Co-Defendants, written summaries of any oral statement or copies thereof made by the Defendant or Co-Defendants to a Prosecuting Attorney or any law enforcement officer, and the recorded testimony of the Defendant or Co-Defendants before a Grand Jury.
2. Documents and tangible objects, including the right to inspect, copy and photograph books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof in the custody and control of the State and which are material to the preparation of the defense or are intended for use by the Prosecuting Attorney as evidence at trial.
3. Reports of examinations and tests, including the right to inspect and copy or photograph any results or reports of scientific tests or experiments made in connection with the particular case.
4. Witness names and addresses together with any record of prior felony convictions of such witness.

5. Copies of all routine offense and incident reports regarding the above-referenced matter, or regarding any co-defendant in the above-referenced matter. See *State ex rel. Steckman v. Jackson*, (1994), 70 Ohio St.3d 420.

6. Copies of any and all 911 tapes and/or transcripts related in any way to the above-referenced matter, whether related to Defendant and/or any co-defendants. See *Cincinnati Enquirer v. Hamilton County*, (1996), 75 Ohio St.3d 374, 662 N.E.2d 334.

7. Copies of any and all statements made by Defendant or any other witness or co-defendant in the above-referenced matter, regardless of the content of such statement, and whether or not such statement is an admission or denial of the alleged charges. See Crim. R. 16(B).

8. Copies of tapes and/or transcripts of any and all police broadcasts relating in any manner whatsoever to the above-referenced matter, including broadcasts to or from any investigating officer, arresting officer, undercover officer, police dispatcher, fire dispatcher, emergency dispatcher or private citizen, relating to the arrest, detention, investigation, seizure or investigative stop of the above-named Defendant or any named co-defendant.


9. Copies of any tapes and/or transcripts of any and all radio transmissions between police officers, or between police officers and any dispatchers, or between any police officers and any private citizen regarding the above-referenced Defendant and/or any named co-defendants. *Steckman, supra*. See also R.C. § 149.43(A)(4).

A motion certifying the failure of discovery will be filed with the Court of Common Pleas within ten (10) days from the date of service of this demand.

B. REQUEST FOR BILL OF PARTICULARS

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Discovery & Bill of Particulars  
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Defendant hereby requests the prosecuting attorney to furnish a Bill of Particulars setting up specifically the nature of the offense charged and the conduct of the Defendant, which is alleged to constitute the offense.

 Respectfully submitted,

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Edward J. Felson (0041988)  
Attorney for Defendant  
36 E. Seventh St., Suite 1650  
Cincinnati, Ohio 45202  
(513) 721-2500

#### MEMORANDUM

A. DEMAND FOR DISCOVERY

Crim. R. 16(B)(1)(a)(i), (ii), (c), (d), (e).

B. REQUEST FOR BILL OF PARTICULARS

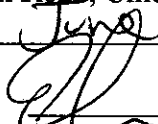
O.R.C. § 2941.07.

 Respectfully submitted,

\_\_\_\_\_  
Edward J. Felson (0041988)  
Attorney for Defendant  
36 E. Seventh St., Suite 1650  
Cincinnati, Ohio 45202  
(513) 721-2500

#### CERTIFICATION

I hereby certify that a copy of the foregoing was served upon Wendy Cross, Assistant U.S. Attorney, 221 East Fourth Street, Suite 400, Cincinnati, Ohio 45202, and Attorney J. Robert Andrews, 2662 Madison Road, Cincinnati, Ohio 45208, by ordinary U.S. mail or hand delivery this 26 day of June, 2002.

  
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Edward J. Felson